

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	*
MOHAMMED MAHMUD HMAIDAN	* CASE NO. 14-04432 MCF
Debtor(s)	* CHAPTER 13

BANCO SANTANDER-PUERTO RICO	*
Movant	*
MOHAMMED MAHMUD HMAIDAN,	*
And JOSE RAMON CARRION MORALES,	*
TRUSTEE	*
Respondent (s)	*

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY
DOCKET NO. 44**

TO THE HONORABLE COURT:

NOW COMES, MOHAMMED MAHMUD HMAIDAN, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On September 01, 2015, Banco Santander - Puerto Rico ("Santander") filed a motion requesting that stay be lifted in the present bankruptcy case, docket no. 44, basically alleging that the debtor is in arrears in the post-petition direct mortgage loan payments to said creditor in the sum of \$4,199.07, including attorney's fees, costs and expenses. In support of said allegations, Santander submits a *Statement of Account*, dated August 28, 2015, executed and signed by Providencia Perez De Jesus, Santander's bankruptcy officer.

Page – 2 –
Debtor's Response to §362 Motion
Case no. 14-04432 MCF13

2. The debtor respectfully submits that he is in the process of obtaining the monies to cure the aforementioned post-petition arrears owed to Santander.

3. The debtor respectfully states that he needs a period of time of thirty (30) days, from the date of the preliminary hearing scheduled for September 29, 2015, to cure the aforementioned post-petition arrears owed to Santander and inform the Court, accordingly. This extension to expire on October 29, 2015.

WHEREFORE, debtor respectfully requests from this Honorable Court to grant the present response to Santander's motion requesting relief from the automatic stay and also grant the requested extension of time, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; Sergio A Ramirez de Arellano, Esq., Counsel for Banco Santander -PR; I also certify that a copy of this motion was sent via regular mail to the debtor/respondent Mohammed Mahmud Hmaidan, PO Box 2017 Las Piedras PR 00771.

. RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, 8th day of September, 2015.

/s/Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR DEBTOR/RESPONDENT
PO BOX 186 CAGUAS PR 00726-0186
TEL NO 787-744-7699 FAX NO 787-746-5294
Email: figueroa@rfclawpr.com